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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CLRB HANSON INDUSTRIES, LLC d/b/a INDUSTRIAL PRINTING, and HOWARD STERN, on behalf of themselves and all others similarly situated, Plaintiffs, vs. GOOGLE, INC., Defendant.	Case No. C 05-03649 JW PVT **DECLARATION OF RACHEL S. BLACK IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, PROVISIONAL CERTIFICATION OF NATIONWIDE SETTLEMENT CLASS, AND APPROVAL OF PROCEDURE FOR AND FORM OF NOTICE** Hearing: Monday, May 11, 2009 Time: 9:00 am. Dept.: Courtroom 8 Judge: Honorable James W. Ware

Dockets.Justia.com

I, Rachel S. Black, hereby declare and state as follows:

1. I am an attorney at Susman Godfrey L.L.P., and counsel for plaintiffs CLRB Hanson Industries LLC d/b/a Industrial Printing and Howard Stern (collectively "Plaintiffs"), in the above-captioned action. I am a member in good standing with the bar of the State of Washington. I am over the age of eighteen, attest to the following matters from personal knowledge, and if called as a witness, could competently testify to the matters set forth herein.

2. Before reaching settlement, Susman Godfrey L.L.P. and Wolf Popper LLP (collectively, "Representative Plaintiffs' Counsel") extensively analyzed the applicable law and facts of this case, which included reviewing thousands of pages of documents produced by Google and taking several depositions of Google representatives. Based on public data released by Google concerning the number of AdWords customers, Representative Plaintiffs' Counsel believe that the number of class members easily exceeds one thousand.

3. Settlement was achieved in this case as a result of vigorous, arm's-length negotiations. Representative Plaintiffs' Counsel believe based on their analysis that the proposed settlement is eminently fair, reasonable, and adequate and warrants judicial approval.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signed this 26th day of March, 2009, at Seattle, Washington.

s/ Rachel S. Black
Rachel S. Black

CERTIFICATE OF SERVICE

I hereby certify that on the date written above, that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. The Court or the CM/ECF system will send notification of such filings to all CM/ECF participants, as follows:

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s/ Rachel S. Black